


July 5, 2024

VIA ECF AND EMAIL

Honorable Lorna G. Schofield
United States District Judge
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Dated: July 8, 2024
New York, New York



LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Re: Morgan v. Champagne Campaign, Inc., Civil Action No. 1:24-cv-04127 (LGS)

Dear Judge Schofield:

We represent defendant Champagne Campaign, Inc. ("Defendant") in connection with the above-referenced matter. Defendant was served with the summons and complaint on June 18, 2024, and its response is currently due July 9, 2024. As we have only recently been retained and require more time to investigate the claims and prepare Defendant's response, we reached out to Plaintiff's counsel, Dan Shaked, Esq., who agreed to extend Defendant's time to respond to the complaint for an additional thirty days.

Accordingly, we write with Plaintiff's consent to request a brief extension of time for Defendant to answer, move or otherwise respond to the complaint, until August 9, 2024. Pursuant to Your Honor's Individual Rules, Defendant states that there have been no previous requests for an extension.

As there is also an initial scheduling conference before Your Honor scheduled for July 17, 2024, the parties also agreed that it would be more efficient to hold the conference after Defendant has responded to the complaint. Accordingly, the parties jointly request that the initial conference be adjourned until a date and time after August 9, 2024 that is convenient for the Court.

Please feel free to contact me if Your Honor desires any additional information.

Respectfully submitted,

/s/ Sean J. Kirby

Sean J. Kirby

cc: Dan Shaked, Esq. (via ECF)